

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Stacey Abrams,

Plaintiff,

v.

Ceteris Portfolio Services, LLC
dba SRA Associates
dba Strategic Resource Alternatives
c/o Illinois Corporation Service Co.
801 Adlai Stevenson Drive
Springfield, IL 62703,

Defendant.

Case No.

COMPLAINT

Jury Demand Requested

JURISDICTION AND VENUE

- 1- This court has jurisdiction pursuant to 28 U.S.C. §§1331, 1337, 1367; and 15 U.S.C. §1692k(d).
- 2- Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

PARTIES

- 3- Plaintiff is a resident of the State of Illinois.
- 4- Plaintiff is a “consumer” as defined in the Fair Debt Collection Practices Act, 15 USC 1692 et seq. (“FDCPA”).
- 5- Plaintiff incurred a “Debt” as defined in the FDCPA.
- 6- Defendant is a company with its principal office in the State of New Jersey.
- 7- Defendant acquired the Debt after it was in default.

- 8- Defendant regularly attempts to collect, or attempts to collect, debts that it acquired after the same were in default.
- 9- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.
- 10- At all times relevant, Defendant was a “debt collector” as defined in the FDCPA.

FACTS COMMON TO ALL COUNTS

- 11- In or around June 2021, Defendant telephoned Plaintiff to collect a debt.
- 12- During this communication, Plaintiff notified Defendant that she was represented by an attorney and provided her attorney’s contact information.
- 13- During this communication, despite being told that Plaintiff was represented by an attorney, Defendant continued to speak with Plaintiff and tried to discuss payment options.
- 14- During this communication, Plaintiff again notified Defendant that she was represented by an attorney and wanted to remain represented by her attorney.
- 15- Despite having notice of Plaintiff’s representation, in or around July 2021, Defendant again telephone Plaintiff.
- 16- During this communication, Defendant asked Plaintiff if she had reconsidered the payment options that were mentioned in the previous call.
- 17- By attempting to discuss payment options after being notified that Plaintiff was represented by an attorney, Defendant violated the FDCPA.
- 18- By contacting Plaintiff after being notified that she was represented by an attorney, Defendant violated the FDCPA.
- 19- Defendant damaged Plaintiff.

COUNT I

20- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

21- Defendant violated 15 USC § 1692e by engaging in false, deceptive, or misleading methods to collect a debt.

COUNT III

22- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

23- Defendant violated 15 USC § 1692f by engaging in unfair and/or unconscionable means to collect, or attempt to collect, the Debt.

COUNT III

24- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

25- Defendant violated 15 USC § 1692e(5) by threatening action that could not be legally taken or that Defendant did not intend to take.

COUNT IV

26- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

27- Defendant violated 15 USC § 1692e(10) by making false representations during the collection of a debt.

JURY DEMAND

28- Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

29- Plaintiff prays for the following relief:

- a. Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);

- b. Judgment against Defendant for \$1,000 in statutory damages for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c. Judgment against Defendant for Plaintiff's reasonable attorneys' fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3); and
- d. Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

The Litigation Practice Group

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